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**UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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BODO PARADY, as Special Administrator of
the Estate of SABINA PARADI and BODO
PARADY and MARY MOORE, individually,

07 CIV 3640 (JCF)
ECF CASE

Plaintiffs,

Magistrate Judge Francis

-against-

**DEFENDANT'S PROPOSED
VOIR DIRE QUESTIONS**

MICHAEL R. PHILLIPS,

Defendant,
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Defendant requests that the following inquiries be made of the jury panel members:

1. Re: Juror, spouse and family members:
 - (a) Name, address and education level including areas of concentration.
 - (b) Ages and residences of children and grandchildren.
 - (c) Details of employment of each.
 - (d) Did any of these sustain a neurological or traumatic brain injury?
2.
 - (a) Details of jury service.
 - (b) Will anything in prior jury service effect your ability to be fair?
3. Details of any law suit involving personal injury or death, which you or a family member were involved in.

4. (a) Do you operate or own a motor vehicle?

 (b) With what regularity do you drive it?

 (c) How often do you operate it on streets of Manhattan?

 (d) Have you ever been in an accident? If so, please give details.

5. Do you feel that for any reason you may find it difficult to be fair both to the plaintiff and the defendant?

6. Will you be able to follow the law that the judge gives you at the end of the case, even if you disagree with it?

7. Will you be able to follow the law that the judge gives you at the end of the case, if to do so, brings about a result that you feel is not the result that should be had in this case?

8. Do you consider yourself a good judge of character and truthfulness?

9. What feelings do you have about the parents of an adult child seeking money as a result of the death of that child?

10. Have you heard anything about the circumstances of this case before coming here today?

11. (a) Have you, a family member, or a close friend ever been injured in an accident or had a child injured due to an accident? If so, please explain and give details.

 (b) Would any such accident or legal proceedings involving such accident effect your ability to be fair in this case?

12. Will you have difficulty in listening to testimony of a witness and making a determination regarding his or her credibility?

13. Have you or any close family member or friend ever testified as a witness at any other trial or proceeding? If yes, please give details.

14. Do you have any problem or disability which would make it difficult for you to follow or evaluate the evidence presented in this case? If so, please describe the problem or difficulty.

15. Did you serve in a branch of the Armed Services? If so, please give details.

16. Have you ever lost a child for any reason? If so, please give details.

17. Have you ever been supported financially by any of your children? If so, please give details.

18. Do you have any medical or nursing training? If so, please give details.

19. While traveling on city streets, do you feel that both pedestrians and drivers have a responsibility to avoid accidents?

20. Despite the sad circumstances of this case, if instructed to do so, can you make all decisions in this case without sympathy or emotion?

21. Although you may have feelings concerning parents' loss of an adult child, will you be able to follow the court's instructions that parents can only be compensated for their pecuniary or financial loss?

Dated: New York, New York
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